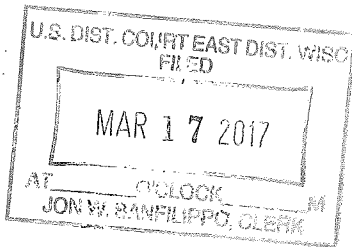


MAR 17 2017

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AFTER HOURS



COMPLAINT

(for non-prisoner filers without lawyers)

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN

(Full name of plaintiff(s))

RAQUEL Hunter

v.

Case Number: **17-C-0401**

(Full name of defendant(s))

Managed Health
Services

(to be supplied by Clerk of Court)

A. PARTIES

1. Plaintiff is a citizen of WISCONSIN and resides at
(State)

7031 W. HAMPTON AVENUE
(Address)

(If more than one plaintiff is filing, use another piece of paper.)

2. Defendant Managed Health Services
(Name)

is (if a person or private corporation) a citizen of WISCONSIN
(State, if known)

and (if a person) resides at _____
(Address, if known)

and (if the defendant harmed you while doing the defendant's job)
worked for Managed Health Services
10700 West Research Drive
Wauwatosa, WI 53226 (Employer's name and address, if known)

(If you need to list more defendants, use another piece of paper.)

B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

please see attached
typed statement.

I Raquel Hunter began employment with Managed Health Services on January 31, 2012 as a Program Coordinator. On Aug 4, 2015 my Manager Patti Damon put together an overtime project for my team to be a part of. I worked overtime on 8/4/15-8/6/15. On 8/7/15 my Manager Patti Damon pulled me off the overtime project without reason; however, she allowed my white coworkers to continue to work on the overtime project. On August 10, 2015 my Manager Patti Damon called me into her office and stated I was not following the correct work process. I explained to her I was following the same work process as my fellow white coworker who was not written up but I was written up and put on a Final Performance Improvement Plan. There was no policy in place at the time of my write up to support Mrs. Damon's claims; however, once I filed my claim with EEOC and Managed Health Services received notice the process was then changed to support the process she originally stated I was not following.

In the Final Performance Improvement Plan write up Patti Damon stated I was to remain on task at my desk and keep socializing to break times and lunch times. No one else on my team was given this direction from Mrs. Damon. On 8/27/15 I received a packet in one of the employee trainings that had a racial slur that was used to degrade/belittle my race.

In the time I had worked for Managed Health Services I had never been written up. I received annual raises, bonuses, tuition reimbursement for my education costs, and my annual reviews was rated that I met expectations by my previous manager. I believe that Mrs. Damon subjected me to different terms of employment from my white coworkers based on my race; black. These actions were deliberate and blatant. Due to the amount of emotional stress and the fact that I was treated different because of my skin color, I could no longer work under these conditions, I resigned on Sep 29, 2015.

C. JURISDICTION



I am suing for a violation of federal law under 28 U.S.C. § 1331.

OR



I am suing under state law. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$ _____.

D. RELIEF WANTED

Describe what you want the Court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or to stop doing something.

- ① I am requesting a neutral ^{employee} reference.
- ② Managers should be required to attend yearly EEO trainings.
- ③ Patti Damon should be demoted due to her Malicious, blatant Discriminatory Actions.
- ④ I am looking for punitive damages as I believe her actions towards me were Malicious, blatant, disheartening and unfair, due to my race. Due to the Performance Improvement Plan Policy, I would not have received my annual Bonus \$3,500 — My Yearly Tuition reimbursement of \$5,000 — due to her discriminatory actions. I missed (115.5 hrs) of over-time. My white coworkers →

Continued to work the project. My overtime rate of pay was \$29.45 per hr (x) the 115.5 hrs of overtime everyone except me worked = \$3,401.⁴⁸

⑤ I resigned due to her actions, I was scared of being fired, being a single parent w/ 2 children. I took a job as a CNA paying me \$7 per hr less than my \$19.63 ^{rate of pay} per hr at MHS, I am requesting 1 year of my annual salary to make me whole again and put me back in my original state financially before these malicious actions were taken against me.

⑥ There is no dollar amount that I could ask for that would explain what I went through emotionally, I was humiliated, isolated, treated differently, because of my race; a very hurtful situation to have endured. My life changed because of her actions. I was unable to return to school until Jan of this year. I ~~took~~ ~~asked~~ for a job paying \$7 less per hour all to continue supporting my family. my financial ^{Complaint - 5} situation changed drastically, all because of one person →

who disliked me because of my race.
I am asking for \$10,000 in emotional
stress or the maximum of what the
law allows. I am asking to be
compensated for what I was put
through by my Manager Patti Damon.

My yearly salary was \$37,689.60
+ everything I've listed for the monetary
amounts.

lastly I would like an apology from
the company or Patti Damon for
what I endured.

the company offered me \$1,200, and
then \$4,500 clearly they are negating
the ~~very~~ unfortunate situation I went
through by not attempting to compensate
me for all I went through emotionally
& financially. There is no way I can
recover what I lost with these
amounts.

Thank you

E. JURY DEMAND

I want a jury to hear my case.

☐ - YES

☒ - NO

I declare under penalty of perjury that the foregoing is true and correct.

Complaint signed this 18th day of March 2017.

Respectfully Submitted,

Raquel Hunter

Signature of Plaintiff

414) 639- 5686

Plaintiff's Telephone Number

raquelhunter41@gmail.com

Plaintiff's Email Address

7031 W. Hampton Avenue

Milwaukee, WI 53218

(Mailing Address of Plaintiff)

(If more than one plaintiff, use another piece of paper.)

REQUEST TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING THE FILING FEE



I DO request that I be allowed to file this complaint without paying the filing fee. I have completed a Request to Proceed in District Court without Prepaying the Filing Fee form and have attached it to the complaint.



I DO NOT request that I be allowed to file this complaint without prepaying the filing fee under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.